

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
Southern Division

ANTONIO FAVORS,

*

*

Plaintiff

*

v.

Case No.: _____

*

MOHAMMADREZA JOURABLI, et al.,

*

Defendant

*

* * * * *

NOTICE OF REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. § 1441(b) DIVERSITY

TO THE CLERK OF THE COURT:

PLEASE TAKE NOTICE THAT Defendant, Lyft, Inc. (“Defendant”), by and through its attorneys, Ashley L. Voli and Lewis Brisbois Bisgaard & Smith, LLP, hereby removes to this Court the State Court action described below pursuant to diversity jurisdiction under 28 U.S.C. § 1441(b):

1. On October 1, 2021, a civil action for alleged personal injury was commenced in the Circuit Court for Montgomery County, Maryland, captioned *Antonio Favors v. Mohammadreza Jourabli and Lyft, Inc.*, Case No. 487457-V.

2. As required by 28 U.S.C. § 1446(a), a copy of the following pleading is attached hereto: Plaintiff’s original Complaint is attached hereto as Exhibit A.

3. This Notice of Removal is filed within one (1) year of the commencement of the action in State Court and, therefore, the Notice is also timely pursuant to 28 U.S.C. § 1446(c).

4. This civil action is subject to removal to this Court by Defendant pursuant to 28 U.S.C. § 1332, § 1441(b) and § 1446, in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

5. Complete diversity of citizenship exists. As stated in the Complaint, Plaintiff is a resident of Tennessee and Defendant Lyft, Inc. is a corporate entity with its principal office in California and incorporated under the laws of Delaware. As also stated in the Complaint, Defendant Jourabli is a resident of Virginia. A copy of the Maryland State Department of Assessments and Taxation data for Lyft, Inc. is attached hereto as Exhibit B.

6. In the Complaint, which contains causes of action against Defendants for alleged negligence, Plaintiff seeks damages “in an amount in excess of Seventy Five Thousand Dollars (\$75,000.00)[.]” Thus, the amount in controversy for diversity jurisdiction is satisfied.

7. Removal to the Southern District of the United States District Court for the District of Maryland is proper under 28 U.S.C. § 1441(a), as the State Court action is venued in Montgomery County, Maryland and the alleged acts giving rise to the claim occurred in Montgomery County, Maryland.

8. Pursuant to 28 U.S.C. § 1446(d), with the filing of this Notice of Removal, Defendant has taken necessary steps to provide written notice of removal to Plaintiff’s counsel and to file a Notice of Filing Notice of Removal in the Circuit Court for Montgomery County. A true and accurate copy of the Notice of Filing Notice of Removal to be filed in the Circuit Court for Montgomery County is attached hereto as Exhibit C.

WHEREFORE, Defendant, Lyft, Inc., respectfully removes the State Court action to this Court.

Respectfully submitted,

/s/ Ashley L. Voli

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Attorneys for Defendant, Lyft, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of March, 2022, a copy of the foregoing Notice of Removal of Action Under 28 U.S.C. § 1441(b) Diversity was filed electronically via CM/ECF, with a copy mailed by first class mail, postage prepaid to:

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/s/ Ashley L. Voli
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